

ASHA SMITH and EMMA NEDLEY, each )  
individually and on behalf of all others )  
similarly situated, )

Plaintiffs,

V.

UNIVERSITY OF PENNSYLVANIA,

Defendant.

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3. Throughout the entire spring 2020 semester, students had both virtual and in-person access to Penn's Student Health Service. There was no limit on the number of times a given student could access the Student Health Service, either virtually or in-person. Between March 16, 2020 and the end of May 2020, Student Health conducted 669 in-person appointments and 4,605 remote appointments. Penn also increased staffing during the Spring 2020 semester to handle the need for in-person and telemedicine services provided by Student Health Service.

4. Penn's SIS continued to provide in-person and virtual services to students following the onset of the pandemic. SIS served hundreds of students, including those who "walked in" with concerns and issues following the onset of the pandemic. Immediately following the onset of the pandemic, between March 12 and March 22, 2020, SIS served about 450 students with concerns related to the pandemic. And from March 23, 2020 to May 15, 2020, SIS served more than 400 students and managed about 85 cases per week. SIS also responded to crises and student support needs unrelated to the pandemic, including a suicide attempt, a significant psychiatric hospitalization, and other mental-health emergencies. For example, SIS conducted 48 wellness checks to track down students who were not responding to faculty or staff.

5. Penn's Counseling and Psychological Services ("CAPS") remained open and continued to provide services, both in-person, and remotely via telehealth. For example, between March 16th and the end of May, CAPS provided 6,702 direct services such as on-going counseling sessions to students. These sessions were both in-person and/or remote appointments depending on the student's needs. CAPS also conducted 228 initial assessments and held 118 "drop-in" appointments between March 16, 2020 and May 31, 2020.

6. Following the onset of the pandemic, Penn began offering COVID specific care, including coordinated care and follow-up services for any students, regardless of their location, who were positive for, exposed to, or showed symptoms consistent with COVID-19. For example, Penn performed 175 different instances of contract tracing due to COVID-19 before the end of April 2020. Penn also increased staffing to handle the need for the in-person and telemedicine services as well as COVID specific activities such as contact tracing offered by Wellness Services.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and this declaration is executed this 25 day of February, 2022 at Philadelphia, Pennsylvania.

  
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Erika Gross